

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	Case No. 23-90147 (DRJ)
MOUNTAIN EXPRESS OIL COMPANY,	§	(Chapter 11)
<i>et al.</i> ¹	§	(Jointly Administered)
DEBTORS.	§	

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PLEADINGS**

Pursuant to Rules 2002(g) and 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned counsel enters an appearance for GSS Holdings LA, LLC and Sukhranjan Multani (collectively, “GSS Holdings”), and requests that copies of all pleadings, motions, notices, and other papers, filed or served, in this proceeding, be served upon the undersigned counsel for GSS Holdings at the following street addresses, e-mail addresses, or facsimile numbers:

Lloyd A. Lim
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¹ A complete list of each of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company’s principal place of business and the Debtors’ service address in these Chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

FURTHER NOTICE is hereby given that the foregoing request includes all notices and copies of all motions, notices, reports, briefs, applications, complaints, demands, hearings, pleadings, adversary proceedings, proposed orders, confirmed copies of orders, or request, formal or informal, whether transmitted or conveyed by mail, email, fax or otherwise that has been filed with the court, any other documents or instruments filed in the above-referenced bankruptcy and any other matter in which notice is required pursuant to 11 U.S.C. § 1109(b) and Bankruptcy Rules 2002(a) and (b), 3017(a), and 9013 of the Federal Rules of Bankruptcy Procedure.

FURTHER NOTICE is hereby given that this Notice of Appearance and any later appearance, pleading, claim or suit shall not be deemed to be a waiver of the rights of GSS Holdings (1) to have final orders in matters and proceedings in which a Bankruptcy Court does not have the power to enter a final order under Article III of the Constitution entered only after *de novo* review by a District Court Judge, (2) to trial by jury in any proceeding so triable in this bankruptcy or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to any rights, actions, or defenses relating to the scope of the Bankruptcy Court's jurisdiction, or (5) to any other rights, claims, actions, defenses, setoffs, or recoupments to which GSS Holdings is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments GSS Holdings expressly reserves. Nor shall this Notice of Appearance be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

[Signature on Next Page.]

Dated: May 12, 2023

Respectfully submitted:

KEAN MILLER LLP

By: /s/ Lloyd A. Lim

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***Attorneys for GSS Holdings LA, LLC and
Sukhranjan Multani***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on May 12, 2023, a copy of the foregoing document served to all parties entitled to receive notices through the Court's electronic notification system as permitted by Local Rules of the U.S. Bankruptcy Court for the Southern District of Texas:

/s/ Rachel T. Kubanda
Rachel T. Kubanda